



September 1, 2005

4858.01

Humboldt County Department of Health & Human Services  
Division of Environmental Health  
100 H Street, Suite 100  
Eureka, California 95501

Attention: Mark Verhey

Subject: Interim Remedial Action Plan Addendum  
Former Pete's Automotive Service; 1409 Main Street, Fortuna, California  
LOP No. 12517

Dear Mr. Verhey:

## **INTRODUCTION**

LACO ASSOCIATES (LACO) presents to the Humboldt County Division of Environmental Health (HCDEH) this addendum to the *Interim Remedial Action Plan (IRAP)* dated November 24, 2003. The original IRAP stated that LACO would assist our client in obtaining a licensed contractor to excavate and "chase" visually contaminated soil and soil that exhibits concentrations higher than 50 parts per million (ppm) from a "*photo ionization detector*" (PID). Additionally, the IRAP stated that limits of excavation would be based on laboratory results of the boring installation performed on March 3, 2004. PID readings and data from the March 3, 2004, boring installation will not be used for disposal purposes and for defining the limits of excavation.

This addendum summarizes LACO's intent to use on-site mobile laboratory services for analysis of soil samples during excavation activities. Per verbal communication with the Underground Storage Tank Cleanup Fund (USTCF) on April 19, 2005, mobile laboratory services will be used to analyze soil samples for disposal purposes and to define the limits of excavation. Analytical results obtained from the mobile laboratory will assist in the excavation activities by documenting real-time compliance with USTCF guidelines for reimbursement of excavation costs for our client.

## PROPOSED CHANGES TO EXCAVATION ACTIVITIES

One soil sample will be collected for every 50 cubic yards (yd<sup>3</sup>) of excavated material and analyzed on-site, using a mobile laboratory, for determining the limits of excavation and disposal purposes. In order to minimize laboratory costs, one out of four samples will be split and sent to North Coast Laboratories Ltd. (NCL) for analysis. Split samples of soil will be contained in brass tubes, sealed with Teflon tape, capped, labeled, and placed in an ice-filled cooler to ensure the preservation of the analytes. Soil samples submitted to the mobile laboratory and NCL will be analyzed for:

- Total petroleum hydrocarbons as gasoline (TPHg) by EPA Method 8021/5035
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX) by EPA Method 8021/5035
- Methyl tertiary butyl ether (MTBE) by EPA Method 8021/5035
- Total petroleum hydrocarbons as diesel/motor oil (TPHd/mo) by EPA Method 3550 with Silica Gel Cleanup

Soil identified with petroleum hydrocarbon concentrations above 50 µg/g will be excavated and transported for disposal at an approved facility. Additionally, the river run gravel used for back fill during the 1995 tank closure will not be disposed from the proposed excavation activities.

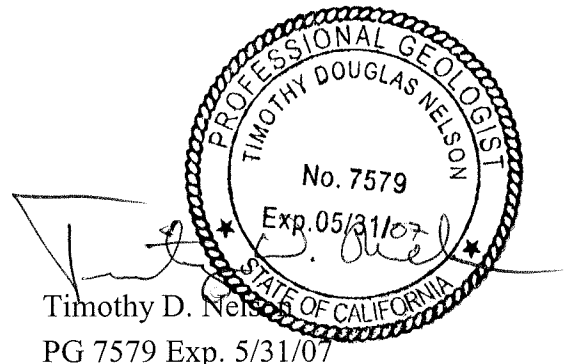
## RECOMMENDATIONS

LACO respectfully requests HCDEH's approval of mobile laboratory services for excavation activities. Additionally, LACO requests HCDEH's approval of the proposed 50 µg/g threshold for petroleum hydrocarbon concentrations in soil that will be used in the identification of limits of excavation.

Please call if you have any questions or concerns.

Sincerely,  
LACO ASSOCIATES

*for Amy M. Johnson*  
Todd B. Becker  
Assistant Geologist



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cc: Pete Perdew  
Jeff Delgado, USTCF

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